

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to HTA.

**ORDER GRANTING FOUR HUNDRED THIRTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE PUERTO RICO HIGHWAYS AND TRANSPORTATION
AUTHORITY TO SATISFIED CLAIMS**

Upon the *Four Hundred Thirty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority to Satisfied Claims* [ECF No. 20488] (the “Four Hundred Thirty-First Omnibus Objection”),² filed by the Puerto Rico Highways and Transportation Authority (“HTA”), dated April 1, 2022, for entry of an order reclassifying certain

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Thirty-First Omnibus Objection.

claims filed against HTA, as more fully set forth in the Four Hundred Thirty-First Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Thirty-First Omnibus Objection and to grant the relief requested therein pursuant to section 306(a) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)³; and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Thirty-First Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Thirty-First Omnibus Objection (collectively, the “Satisfied Claims”) have been satisfied; and the Court having determined that the relief sought in the Four Hundred Thirty-First Omnibus Objection is in the best interests of HTA, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Thirty-First Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Thirty-First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Satisfied Claims are disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Satisfied Claims as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 20488 in Case No. 17-3283; and it is further

³ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Thirty-First Omnibus Objection

Four Hundred Thirty-First Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	JANSSEN ORTHO, LLC MCCONNELL VALDES LLC C/O NAYUAN ZOUAIRABANI PO BOX 364225 SAN JUAN, PR 00936-4225	5/24/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	20345	\$ 74,800.00*
Reason: Proof of Claim asserts settlement agreement between HTA and creditor. HTA deposited funds with the Commonwealth court in compliance with the agreement, and the creditor fully withdrew those funds on December 10, 2019.						
2	TOMAS CUERDA INC. ATTN: LUIS JOSE CUERDA CFO PO BOX 363307 SAN JUAN, PR 00936	6/25/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	50397	\$ 700.00
Reason: Proof of Claim asserts liability on the basis of Invoice No. 78705. The records of the Highway and Transportation Authority show the invoice has been fully satisfied, pursuant to Wire # 1101360 dated 1/29/2019.						
					TOTAL	\$ 75,500.00*